

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

**IN RE: CAST IRON SOIL PIPE AND
FITTINGS ANTITRUST LITIGATION**

No. 1:14-md-2508-HSM-CHS

**THIS DOCUMENT RELATES TO:
DIRECT PURCHASER CLASS ACTION**

**DIRECT PURCHASER PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF
PROPOSED SETTLEMENT WITH DEFENDANTS AND CERTIFICATION OF
SETTLEMENT CLASS**

Pursuant to Rule 23(e) and (g) of the Federal Rules of Civil Procedure, direct purchaser plaintiffs A&S Liquidating Inc., Hi Line Supply Co. Ltd., and Red River Supply, Inc. ("Plaintiffs"), on behalf of themselves and all others similarly situated, by and through the undersigned Interim Co-Lead Class Counsel, respectfully move this Court for an Order:

1. Preliminarily approving the Settlement Agreement, and finding that its terms are sufficiently fair, reasonable and adequate;
2. Provisionally certifying the proposed Settlement Class as defined in the Settlement Agreement (the "Settlement Class");
3. Approving the form and procedure of class notice;
4. Staying the proceedings against Defendants (as defined in the Settlement Agreement) in accordance with the terms of the Settlement Agreement;
5. Approving RG2 as claims administrator for the Settlement, and Presidio Bank as Escrow Agent.

This motion is based on the accompanying Memorandum of Law in Support and the Declaration of Robert N. Kaplan submitted herewith.

WHEREFORE, Plaintiffs respectfully requests that this Court grant this Motion for Preliminary Approval of Proposed Settlement and issue the [Proposed] Order Granting Preliminary Approval of Settlement.

Dated: October 21, 2016

Respectfully submitted,

/s/ Scott N. Brown, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2016, I caused true and correct copies of the foregoing to be served electronically. Notice of this filing will be sent by operation of the Court's CM/ECF system to all parties shown on the electronic filing receipt.

/s/ Robert N. Kaplan
Robert N. Kaplan